

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA,

Plaintiff,

vs.

Case No. 18-cr-146-jdp

PETER JEWELL-REIGEL,

Defendant.

UNOPPOSED MOTION TO CONTINUE REVOCATION HEARING

Peter Jewell-Riegel, by counsel, moves to continue the revocation hearing. I have spoken with AUSA Elizabeth Altman and USPO Melissa Lach and neither oppose this motion.

According to the 12(C) and the defense's investigation, Jewell-Reigel's state probation agent called him in to discuss some alleged violations. He was driving to the appointment with his parents, when he (for lack of a better term) freaked out. He proclaimed that he could not handle being a sex offender anymore, jumped out of his parents' car, cut off his GPS bracelet, and fled to Texas. Once there, he tried to commit suicide-by-cop and was shot multiple times with non-lethal bullets. He is (without question) lucky to be alive.

At the revocation hearing, the defense will not contest the violations. The issue will be the appropriate sentence. I represented Jewell-Riegel on the original case and over the years, I have stayed in touch with his family, who are incredibly supportive and wonderfully kind people. As I prepared for the revocation hearing and talked to them

about the circumstances leading up to the violation, and to Jewell-Reigel about the underlying problems he was encountering, I began to suspect that he should be evaluated. There were things in his past and in his behavior that speak to not just immaturity and executive functioning, but possibly greater cognitive problems. I contacted Dr. Nancy Elliot and talked through my concerns, and she believes that Jewell-Reigel would benefit from a full psychological exam.

This cannot be done overnight, and Dr. Elliot thinks it would not be completed until May. While delay is never ideal, given the severity of these allegations, there is no realistic risk of Jewell-Reigel overserving his sentence. In addition, while I will have left the Federal Defender by that point, I plan to continue my representation of him. Finally, even if the evaluation does not speak to the core § 3553(a) factors for mitigation, having the evaluation will benefit those who have to supervise him in the future and allow them to better understand his circumstances. Thus, for all those reasons, the defense respectfully requests that the revocation hearing be continued to allow Mr. Jewell-Reigel to have a psychological exam. Again, AUSA Elizabeth Altman and USPO Melissa Lach do not oppose this motion.

Dated at Madison, Wisconsin this 18th day of March, 2024.

Respectfully submitted,

Peter Jewell-Reigel, Defendant

/s/Joseph A. Bugni
Joseph A. Bugni

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